

STATE OF INDIANA) IN THE ST. JOSEPH CIRCUIT/SUPERIOR COURT
) SS: **71C01-1910-CT-000385**
COUNTY OF ST. JOSEPH) CAUSE NO.: _____

BONNIE J. GODFREY,
4362 CARPET STREET
STEVENSVILLE, MICHIGAN 49127

Plaintiff,

v.

SPEEDWAY LLC,
c/o CT CORPORATION SYSTEM, Resident Agent
150 WEST MARKET STREET, SUITE 800
INDIANAPOLIS, INDIANA 46204

Defendant.

COMPLAINT FOR DAMAGES

Comes now the Plaintiff, by counsel, and for her claim for relief, states the following:

1. On or about the 20th day of January, 2019, the Plaintiff, was a business invitee on the Defendant's premises located at 6161 West Brick Road, South Bend, Indiana when she fell.
2. The Defendant failed to maintain the premises and/or warn the Plaintiff of a dangerous and/or hazardous condition.
3. As a direct and proximate result of the carelessness and negligence of the Defendant, the Plaintiff sustained personal injuries, the effects of which may be permanent and lasting; has incurred hospital, doctor and medical expenses and may continue to incur hospital, doctor and medical expenses in the future; has incurred pain and suffering and may continue to incur pain and suffering in the future, all of which damages are in an amount yet uncertain.
4. As a further direct and proximate result of the carelessness and negligence of the defendant, the plaintiff has incurred lost wages and may continue to incur lost wages in the future.

WHEREFORE, Plaintiff demands judgment against the Defendant in an amount that will reasonably compensate her for the injuries and damages sustained, for the costs of this action and for all other just and proper relief.



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